REMARKS

Applicant thanks the Examiner for examining the application. Applicant has amended claim 11 to correct the typographical error identified by the Examiner. Applicant has also added new claims 35 and 36. Support for these amendments may be found throughout the specification, and the addition of new claims 35 and 36 does not constitute adding new subject matter. With this amendment and response, claims 1-36 are pending in the application.

Specification

Applicant has replaced the paragraph beginning at line 7 of page 6 to include the specific "U.S. Serial No." and filing data information previously missing from lines 10-13, as required by the Examiner. Applicant has also included the proper Patent No. as the referenced application has now issued as a U.S. Patent.

Claim Rejections – 35 U.S.C. §102(b)

The Examiner rejected claims 1-34 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,606,663 to Liao et al. For each claim being rejected, the Examiner cited to the same text of Liao et al., namely, col. 1 line 13 to col. 2 line 64 and col. 6 line 61 to col. 8 line 23, as well as the Abstract and Figs. 1-3, "as broadly interpreted by the Examiner". Applicant respectfully submits, with regard to the rejection of dependent claims 2-16 and 18-32, that the Examiner has failed to make a proper rejection of the claims under 35 U.S.C. §102(b). For each rejection of a dependent claim, the Examiner quotes the additional limitation of the dependent claim and then states that "The teachings of Liao et al *suggest* such limitations" (emphasis added) followed by the same cite to the same four columns of Liao et al. that are used to reject each of Applicant's thirty-four claims. With all due respect to the Examiner, for an anticipatory rejection under 35 U.S.C. §102(b), what the alleged anticipatory reference suggests is entirely irrelevant. All that matters is what the alleged anticipatory reference actually discloses. *See at least* Manual of Patent Examination and Procedure, §§ 706.02 ¶ IV. and 2133. The Examiner fails to distinctly show where, if anywhere, Liao et al. actually discloses

the limitations present in Applicant's dependent claims 2-16 and 18-32. Thus, Applicant believes that the Examiner's rejection of dependent claims 2-16 and 18-32 is not a proper anticipatory rejection under 35 U.S.C. §102(b). Nonetheless, Applicant responds to the Examiner's rejections below.

Applicant's independent claim 1 requires, among other things, inserting the authentication response into the data communications session between the client device and the server device, and maintaining the data communications session between the server device and the client device in the presence of authentication response information inserted into the data communications session between the client device and the server device. As stated above, the Examiner cites to col. 1 line 13 to col. 2 line 64 and col. 6 line 61 to col. 8 line 23, as well as the Abstract and Figs. 1-3 of Liao et al. as disclosing these limitations. The cited text discloses a proxy server located between a client device and a server containing protected data; *see* Fig. 3 and col. 9 lines 11-13. The proxy server contains the authentication information required by the server for access to the protected data; *see* col. 9 lines 43-46. The proxy server intercepts a request from the client device for access to the protected data that does not include authentication information; *see* col. 9 lines 35-40. The proxy server inserts the necessary authentication information into the request, translates the request, and sends the request to the server; *see* col 9 lines 35-46. Upon receipt of the request containing the proper authentication information, the server returns the requested protected data to the proxy server; *see* col. 11 lines 47-51 and 58-60. The proxy server translates the protected data and sends it to the client device; *see* col. 11 lines 58-60.

However, when a proxy server sits between a client and a server in the manner of the system disclosed in Liao et al., there is no single data communications session between the client and the server for an authentication response to be inserted into, or to be maintained in the presence of such an inserted authentication response, as required by Applicant's independent claim 1. Rather, there are two communications sessions present – one between the client and the proxy server, and another between the proxy server and the server containing the protected content, as may be seen graphically in Fig. 3. In detail, the proxy server of Liao et al. receives, from a client

device, via a first data communications session (either a WSP or an HDTP session) with that client device, a request for protected data located on a server; *see* col. 9 lines 16-43. The proxy server first inserts an authentication response into the request and then translates that request; *see* col. 9 lines 35-46. The proxy server then communicates with the appropriate server via a separate data communications session (an HTTP session); *see* Fig. 3. During that separate data communications session, the proxy server forwards the translated request containing the authentication response; *see* col 9 lines 35-46. Thus, Liao et al. does not disclose inserting the authentication response into the data communications session between the client device and the server device, as required by Applicant's independent claim 1, nor does Liao et al. disclose maintaining the data communications session between the server device and the client device in the presence of authentication response information inserted into the data communications session between the client device and the server device. Thus, Liao et al. does not disclose Applicant's independent claim 1, and Applicant's independent claim 1 is allowable.

Further, dependent claims 10 and 14, which depend from allowable claim 1, are themselves clearly distinguishable over Liao et al. Claim 10 requires that the step of maintaining the data communications session between the server device and the client device after inserting the authentication response into the data communications session comprises the steps of: maintaining connection state data in the data communications device that tracks an amount of extra data associated with the authentication response that is inserted into the data communications session between the client device and the server device; and modifying connection information within packets passing through the data communications device that are exchanged between the client device and server device using the data communications session in order to allow the client and server device to maintain proper respective first and second connection states for the data communications session regardless of the amount of extra data added in the data communications session due to insertion of the authentication response. Claim 14 requires that the data communications session be a transmission control protocol session between the client device and the server device; and that the step of

maintaining modifies connection information within messages exchanged between the client device and the service device to account for the insertion of authentication information inserted into the data communications session in order to provide automatic authentication of requests for data sent to the server device on behalf of client devices. These claims generally show one of the primary advantages of Applicant's invention, namely that a single data communications session is maintained between a client and a server even though extra data has been inserted into the stream of packets flowing between the client and the server. The proper flow of the sequence numbers and other acknowledgement information of the packets is maintained despite the extra information that has been inserted. Liao et al. does not disclose, either in the text cited by the Examiner or elsewhere, maintaining connection state data that tracks an amount of extra data associated with the inserted authentication response, or modifying connection information within packets passing through the data communications device that are exchanged between the client device and server device using the data communications session in order to allow the client and server device to maintain proper respective first and second connection states for the data communications session regardless of the amount of extra data added in the data communications session due to insertion of the authentication response, as required by Applicant's dependent claim 10. Liao et al. also does not disclose, either in the text cited by the Examiner or elsewhere, that that the data communications session be a transmission control protocol session between the client device and the server device, or that the step of maintaining modifies connection information within messages exchanged between the client device and the service device to account for the insertion of authentication information inserted into the data communications session in order to provide automatic authentication of requests for data sent to the server device on behalf of client devices, as required by Applicant's dependent claim 14. Liao et al. does not disclose these concepts or how one would implement them in the system that is disclosed in Liao et al. Thus, Liao et al. does not anticipate Applicant's dependent claims 10 and 14, for at least these reasons as well as the reasons given above with regards to claim 1.

Applicant's independent claims 17, 33, and 34 all contain the same limitations as described above with respect to Applicant's independent claim 1. Therefore, for at least the reasons given above, Applicant's independent claims 17, 33, and 34 are each allowable over Liao et al.

Applicant's dependent claims 2-16 and 18-32 depend from Applicant's allowable independent claims 1 and 17, respectively. Therefore, for at least the reasons given above, Applicant's dependent claims 2-16 and 18-32 are themselves all allowable over Liao et al.

CONCLUSION

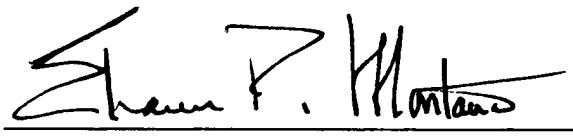
Applicants believe this Amendment and Response to be fully responsive to the present Office Action. Thus, based on the foregoing Remarks, Applicants respectfully submit that this application is in condition for allowance. Accordingly, Applicants request allowance of the application.

Applicants hereby petition for any extension of time required to maintain the pendency of this case. If there is any fee occasioned by this response that is not paid, please charge any deficiency to Deposit Account No. 50-3735.

Should the enclosed papers or fees be considered incomplete, Applicants respectfully request that the Patent Office contact the undersigned collect at the telephone number provided below.

Applicants invite the Examiner to contact the Applicants' undersigned Attorney if any issues are deemed to remain prior to allowance.

Respectfully submitted,



Shaun P. Montana, Esq.
Attorney for Applicant
USPTO Registration No.: 54,320
Chapin Intellectual Property Law, LLC
Westborough Office Park
1700 West Park Drive
Westborough, Massachusetts 01581
Telephone: (508) 616-9660
Facsimile: (508) 616-9661

Attorney Docket No.: CIS01-35(4747)

Dated: March 22, 2006